

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

OLD LC, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-11791 (BLS)

Jointly Administered

Official Committee of Unsecured Creditors of Old  
LC, Inc., et al., for and on behalf of the estates of  
Old LC, Inc., et al.;

Plaintiff,

v.

Upfront V, LP, Breakwater Credit Opportunities  
Fund, L.P.; Upfront GP V, LLC; Mark Suster;  
Dana Kibler; Gregory Bettinelli; Saif Mansour;  
Aamir Amdani; Eric Beckman; Darrick Geant; and  
Joseph Kaczorowski

Adv. No. 20-51002 (BLS)

**REQUEST FOR ORAL ARGUMENT ON MOTION OF UPFRONT V, L.P., UPFRONT  
GP V, LLC, MARK SUSTER, DANA KIBLER AND GREGORY BETTINELLI TO  
DISMISS FIRST AMENDED COMPLAINT AND OBJECTION TO CLAIMS AND  
MOTION TO STRIKE PRAYER FOR COMPENSATORY DAMAGES**

Pursuant to Rule 7007-3 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, defendants Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli (collectively, the “Upfront Defendants”), hereby request that the Court permit oral argument on the *Motion of Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli to Dismiss First Amended*

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<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc. and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is 3401 Pasadena Ave, Los Angeles, CA 90031.

*Complaint and Objection to Claims and Motion to Strike Prayer For Compensatory Damages*

[Adv. Docket No. 35] (the “Motion”) and all responsive pleadings thereto.

The Upfront Defendants respectfully submit that oral argument is appropriate because the Motion presents substantial legal issues and oral argument would allow the parties to clarify the legal, factual or procedural points raised in the Motion and other responsive pleadings.

Dated: May 3, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

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